

## **Exhibit B**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MOLLY CRANE, Individually and on  
Behalf of All Other Persons Similarly  
Situating,

Plaintiff,

v.

SEXY HAIR CONCEPTS, LLC, and  
ULTA SALON COSMETICS &  
FRAGRANCE, INC.,

Defendants.

Case No. 1:17-cv-10300

**DECLARATION OF ANDREW  
PERRY ON BEHALF OF  
SETTLEMENT  
ADMINISTRATOR REGARDING  
NOTICE**

I, Andrew Perry, declare:

1. I am employed as a senior project manager by Kurtzman Carson Consultants (“KCC”), a nationally-recognized notice and claims administration firm located at 462 South 4th Street, Louisville, KY 40202. KCC was retained as the Settlement Administrator in this case, and as the senior project manager, I oversee all aspects of the administrative services provided. I submit this declaration regarding the *Crane v. Sexy Hair Concepts LLC* Notice Program.

2. On October 29, 2018, in compliance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. Section 1715, KCC mailed via United States Postal Service (“USPS”) Priority Mail a cover letter to the U.S. Attorney General and the Attorneys General for all 50 states, plus the District of Columbia and territories along with a CD-ROM containing the following documents: Complaint, Amended Complaint, Sexy Hair Answer of SHC to Amended Complaint, Sexy Hair P’s Assented-To Motion for Preliminary Approval of Class Action Settlement, Settlement Agreement and Release, Declaration of Carla Peak, Proposed

Order Preliminary Approving Class Settlement, Certifying the Class, and Authorizing Class Notice, Declaration of Patrick J. Vallely, Memorandum in Support of Plaintiff's Assented-To Motion for Preliminary Approval of Class Action Settlement, and CAFA Notice Calculations. Copies of the cover letter and the mailing list for the CAFA notice are attached hereto as Exhibit 1.

3. On November 20, 2018, Defendants provided KCC a zip file that contained the names, mailing addresses, and email addresses of 991,297 Settlement Class Members. On December 13, 2018, Defendants provided KCC a second file that contained the names, mailing addresses, and email address of 3,295 Settlement Class Members, for a total of 994,592 Settlement Class Member records. Of the 994,592 records, 30,260 records were flagged as ineligible because they had either zero or negative units. KCC reviewed the remaining data and processed the names and addresses through the USPS National Change of Address database. KCC identified 27,955 records with no valid physical address and 1,849 records with no valid email address, but if a record had at least a valid physical address or a valid email address, the record was included in the notice list. There were 8,771 records that were missing both a valid physical address and a valid email address and were therefore removed from the notice list. Additionally, KCC identified 2,439 duplicate records that were excluded. KCC ran the email table through an email cleanse service to identify invalid email addresses. KCC identified 133,897 emails that were invalid and were therefore removed from the initial email table. There remained a total of 819,225 records with either an email address (749,858) or a postal address (69,367) that could be sent notice.

4. On January 16, 2019, KCC established a Settlement Website for this settlement at [www.sulfatesettlement.com](http://www.sulfatesettlement.com). On the Settlement Website, visitors can view answers to frequently

asked questions, download important case documents including the Complaint, Amended Complaint, Defendant's Answer to Complaint, Settlement Agreement and Release, Plaintiff's Motion for Preliminary Approval, Memorandum in Support of Plaintiff's Motion for Preliminary Approval, Declaration of Patrick J. Vallely, Declaration of Carla Peak, Proposed Order Preliminarily Approving Class Settlement, Order Preliminary Approving Class Settlement, Order Amended Deadlines Set By Preliminary Approval Order, Notice, Claim Form, and Subject Products. Visitors could also submit claims online. Individuals who received a personalized Notice could enter their claim code in order to arrive at a pre-populated Claim Form and those who did not receive a Notice could file a Claim Form without a claim code. A true and correct copy of the long-form notice is attached as Exhibit 2.

5. On January 17, 2019, KCC established a toll free telephone number that Class Members could call and listen to general information about the settlement, important dates and deadlines, request a Claim Form and Notice be sent to them, hear their options as a Class Member, or answers to Frequently Asked Questions.

6. On January 21, 2019, KCC sent the Class Notice via email ("Email Notice") to 749,858 Class Members. The Email Notice contained a personalized link that directed the individual to the pre-filled online Claim Form. A true and correct copy of the Email Notice is attached hereto as Exhibit 3.

7. On January 18, 2019, KCC mailed Class Notice in the form of a postcard ("Postcard Notice") to 69,367 Class Members whose physical address was available. A true and correct copy of the Postcard Notice is attached as Exhibit 4.

8. To date, 252,353 unique Class Members had undeliverable email addresses, consisting of 133,897 records that were found to be invalid through an email cleanse, and

118,456 that were returned as undeliverable. KCC ran a search and updated the physical mail address for Class Members whose Email Notice was undeliverable, and sent the Postcard Notice to 246,483 Class Members.

9. KCC implemented a paid nationwide online advertising campaign consisting of internet banners on the Google Display Network, as well as on the social media site Facebook to be run from January 21, 2019 to February 20, 2019. To date, there have been approximately 116,536,195 internet impressions targeted to likely Class Members and are delivered on both desktop and mobile devices, including tablets and smartphones. By the end of the media campaign there will be approximately 141 million internet impressions. The online ads include an embedded link to the Settlement Website. Conversion tracking is used to monitor and track online behavior, and, also to retarget likely Class Members who file a claim or stop midway through the process. The proposed Notice Plan reaches approximately 70% of likely Class Members via the notification methods described above. Snapshots of the online advertising campaign are attached as Exhibit 5.

10. To date, KCC has received a total of 1,666 Postcard Notices returned by the USPS with forwarding addresses. KCC caused the Class Member list to be updated with the new addresses and Postcard Notice to be re-mailed to the updated addresses.

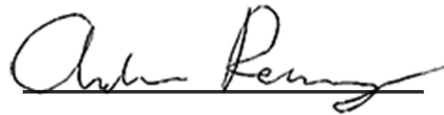
11. To date, KCC has received a total of 4,378 Postcard Notices returned by the USPS without forwarding address information. To date, it appears KCC has successfully sent direct Notice to 942,874 Class Members. KCC may still receive undeliverable Notices. Approximately 24.81% of Class Members received a direct Notice.

12. The deadline to submit a request for exclusion (“opt-out”) is March 20, 2019. To date, KCC has received 0 timely opt-outs and 0 late opt-outs.

13. The deadline to submit an objection to the settlement is March 20, 2019. To date, KCC has received 0 objections.

14. The deadline to submit a Claim Form is March 20, 2019. To date, KCC has received 33,006 timely Claims. Of those, 32,964 claims were submitted online and 42 claims were submitted via postal mail. Approximately 0.87% of the class submitted Claim Forms with a total of 88,240 units claimed. Approximately 2.15% of the class that received a direct Notice submitted Claim Forms.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this February 19, 2019, at Louisville, Kentucky.

A handwritten signature in black ink, appearing to read "Andrew Perry", written over a horizontal line.

Andrew Perry

# **EXHIBIT 1**

Last	First	Company	Address 1	Address 2	City	State	Zip
Anderslund	Johna	Office of the Alaska Attorney General	1031 W. 4th Avenue	Suite 200	Anchorage	AK	99501-1904
Marshall	Steve	Office of the Alabama Attorney General	501 Washington Avenue	PO Box 300152	Montgomery	AL	36130-0152
Ruedge	Leslie	Arkansas Attorney General Office	323 Center Street, Suite 200		Little Rock	AR	72201-2610
Brown	Mark	Office of the Arizona Attorney General	1275 W. Washington Street		Phoenix	AZ	85007
CHFA Coordinator		Office of the Attorney General	Consumer Line Section		San Francisco	CA	94102
Coffman	Cynthia	Office of the Colorado Attorney General	Ralph L. Carr Colorado Judicial Center	455 Golden Gate Ave., Suite 11000	Denver	CO	80203
Jessen	George	State of Connecticut Attorney General's Office	55 Elm Street		Hartford	CT	06106
Rocine	Karl A.	District of Columbia Attorney General	441 4th Street, NW, Suite 1100B		Washington	DC	20001
Sessions	Jefferson	Attorney General of the United States	United States Department of Justice	950 Pennsylvania Avenue, NW	Washington	DC	20530-0001
Denn	Matthew	Delaware Attorney General	Carver State Office Building	820 N. French Street	Wilmington	DE	19801
Bond	Pam	Office of the Attorney General of Florida	The Capitol, P.O. 1		Tallahassee	FL	32399-1050
Carr	Chris	Office of the Georgia Attorney General	40 Capitol Square, SW		Atlanta	GA	30334-1300
Gutski	Russell	Office of the Hawaii Attorney General	425 Queen Street		Honolulu	HI	96813
Miller	Tom	Iowa Attorney General	Hoover State Office Building		Des Moines	IA	50319
Wadsen	Lawrence	State of Idaho Attorney General's Office	700 W. Jefferson Street, Suite 210	1305 E. Walnut Street	Boise	ID	83720-0010
Madigan	Lisa	Illinois Attorney General	James R. Thompson Center	P.O. Box 83720	Chicago	IL	60601
Hill, Jr.	Curis T.	Indiana Attorney General's Office	Indiana Government Center South	100 W. Randolph Street	Indianapolis	IN	46204
Schmidt	Derek	Kansas Attorney General	120 S.W. 10th Ave., 2nd Floor	302 West Washington Street, 5th Floor	Topeka	KS	66612-1597
Beckner	Andy	Office of the Kentucky Attorney General	700 Capitol Ave	Capitol Building, Suite 118	Frankfort	KY	40601
Landry	Jeff	Office of the Louisiana Attorney General	P.O. Box 94895		Baton Rouge	LA	70804-4095
Hesley	Maura	Office of the Attorney General of Massachusetts	1 Ashburton Place		Boston	MA	02108-1518
Fritsch	Brian	Office of the Maryland Attorney General	200 St. Paul Place		Baltimore	MD	21202-2202
Mills	Jane	Office of the Maine Attorney General	State House Station 6		Augusta	ME	04333
Schulte	Bill	Office of the Michigan Attorney General	P.O. Box 30212	525 W. Ottawa Street	Lansing	MI	48909-0212
Lori Swanson	Attorney General	Attention: CAFA Coordinator	Suite 102, State Capitol 75 Dr.		St. Paul	MN	55155
Hanley	Joshua V.	Missouri Attorney General's Office	Supreme Court Building	207 W. High Street	Jefferson City	MO	65101
Hood	Jim	Mississippi Attorney General's Office	Department of Justice	P.O. Box 220	Jackson	MS	39209
Fox	Tim	Office of the Montana Attorney General	Justice Bldg.		Helena	MT	59620-1401
Stein	Josh	Office of the North Carolina Attorney General	Department of Justice	P.O. Box 629	Raleigh	NC	27602-0629
Steenhjem	Wayne	North Dakota Office of the Attorney General	State Capitol	600 E. Boulevard Avenue	Bismarck	ND	58505-0040
Peterson	Doug	Office of the Nebraska Attorney General	State Capitol	P.O. Box 98920	Lincoln	NE	68509-8920
MacDonald	Gordon	New Hampshire Attorney General	33 Capitol Street		Concord	NH	03301-4387
Givens	Guthor S.	Office of the New Jersey Attorney General	Richard J. Hughes Justice Complex	25 Market Street, P.O. Box 980	Trenton	NJ	08625
Baldertse	Victor	Office of the New Mexico Attorney General	P.O. Drawer 1508		Santa Fe	NM	87504-1508
Lesall	Adam Paul	Nevada Attorney General	Old Supreme Ct. Bldg.	100 North Carson Street	Carson City	NV	89701
Underwood	Barbara	Office of the New York Attorney General	Dept. of Law - The Capitol	2nd Floor	Albany	NY	12244
DeWine	Mike	Ohio Attorney General	State Office Tower	30 E. Broad Street	Columbus	OH	43268-0410
Hunter	Mike	Oklahoma Office of the Attorney General	313 NE 21st Street		Oklahoma City	OK	73105
Rosenblum	Ellen F.	Office of the Oregon Attorney General	Justice Building	1162 Court Street, NE	Salem	OR	97301
Shapiro	Josh	Pennsylvania Office of the Attorney General	16th Floor, Stateberry Square		Harrisburg	PA	17120
Romartin	Peter	Rhode Island Office of the Attorney General	150 South Main Street		Providence	RI	02903
Wilson	Alan	South Carolina Attorney General	Rembert C. Dennis Office Bldg.	P.O. Box 11549	Columbia	SC	29211-1549
Jackley	Marty J.	South Dakota Office of the Attorney General	1302 East Highway 14, Suite 1		Pierre	SD	57501-8501
Stetler, III	Fredrick H.	Tennessee Attorney General and Reporter	425 5th Avenue North		Nashville	TN	37243
Pavlov	Ken	Attorney General of Texas	Capitol Station		Austin	TX	78711-2548
Reyes	Sean	Utah Office of the Attorney General	State Capitol, Room 236	350 N State St	Salt Lake City	UT	84114-0810
Herring	Mark	Office of the Virginia Attorney General	202 North Ninth Street		Richmond	VA	23218
Donovan	T.J.	Office of the Attorney General of Vermont	109 State Street		Montpelier	VT	05609-1001
Ferguson	Bob	Washington State Office of the Attorney General	1125 Washington St SE	P.O. Box 40100	Olympia	WA	98504-0100
Schmidt	Brad	Office of the Wisconsin Attorney General	Dept of Justice, State Capitol	RM 114 East P.O. Box 7857	Madison	WI	53707-7857
Monney	Patrick	West Virginia Attorney General	State Capitol	1900 Kanawha Blvd E	Charleston	WV	25306
Michael	Peter K.	Office of the Wyoming Attorney General	State Capitol Bldg.		Cheyenne	WY	82002
Ali	Taliesha Ehasz V.	American Samoa Attorney General	Exec. Ofc. Bldg. Uluia	Territory of American Samoa	Pago Pago	AS	96799
Burrett-Anderson	Elizabeth	Office of the Attorney General, ITC Building	990 S. Marine Corps Drive	Suite 706	Tamuning	Guam	96913
Manibustan	Edward	Northern Mariana Islands Attorney General	Administration Building	PO Box 10007	Saipan	MP	96950-8907
Vazquez Garced	Wanda	Puerto Rico Attorney General	P.O. Box 902152		San Juan	PR	00903-0152
Walker	Claude E.	Virgin Islands Attorney General, Department of Justice	34-38 Kroppinderns Gade	GRS Bldg, 2nd Floor	St. Thomas	VI	00802
Grath	Keith	Greenberg Traurig, LLP	2700 Commerce Square	2001 Market Street	Philadelphia	PA	19103
Cazza	Ryanne	KCC	462 S. 4th St.		Louisville	KY	40202





Keith E. Smith  
Tel (215) 988-7843  
Fax (215) 717-5225  
smithkei@gtlaw.com

October 29, 2018

VIA PRIORITY MAIL

**Re: Notice of Proposed Class Action Settlement Pursuant to the  
Class Action Fairness Act (28 U.S.C. § 1715)**

Dear Sir or Madam:

We write on behalf of defendant Sexy Hair Concepts LLC (“SHC”) pursuant to 28 U.S.C. § 1715 (the Class Action Fairness Act or “CAFA”) to notify you of a proposed class action settlement (the “Settlement”) between SHC and a putative nationwide class of consumers arising from the case captioned as *Crane v. Sexy Hair Concepts, LLC*, U.S. District Court for Massachusetts, Case No. 1:17-cv-10300-FDS (the “Crane Action”).<sup>1</sup>

Plaintiff filed her initial Complaint in the Crane Action on February 23, 2017, and filed her Amended Complaint on June 6, 2017. Plaintiff alleges that she and other similarly situated customers incurred damage as a result of alleged misrepresentations regarding whether certain hair care products sold by SHC were Sulfate-Free and Free of Salt. Plaintiff alleges that SHC violated Mass. Gen. Laws, Chapter 93A and was unjustly enriched as a result of these misrepresentations. Plaintiff asserted these claims on behalf of herself and a putative nationwide class of consumers, seeking relief including but not limited to damages, injunctive relief, attorneys’ fees, and costs. In response to the Amended Complaint, SHC denied that it violated the law and/or that anyone incurred damage. SHC asserted various affirmative defenses to the claims.

Between November 19, 2012 and May 31, 2017, SHC sold a number of hair-care products with a label describing the products as “sulfate free” (“Subject Products”). SHC sought to sell products that did not contain *sodium laureth sulfate* (“SLES”) or *sodium lauryl sulfate* (“SLS”). Within the hair care industry, “sulfate-free” is generally understood to be free of SLS and SLES. The Subject Products did not and do not contain SLES or SLS. In fact, no sulfate is an ingredient in any of the Subject Products. However, trace amounts of sodium sulfate may be present in the Subject Products as a byproduct or impurity of another non-sulfate ingredient.

The Federal Trade Commission’s “Green Guides” provide that a marketer, like SHC, can lawfully “make a claim for a product that still contains some amount of a substance if the level of the specified substance is no more than that which would be found as an

<sup>1</sup> All capitalized terms used herein shall have the same definition as those in the Settlement Agreement which accompanies this letter.

ALBANY  
AMSTERDAM  
ATLANTA  
AUSTIN  
BERLIN<sup>+</sup>  
BOCA RATON  
BOSTON  
CHICAGO  
DALLAS  
DELAWARE  
DENVER  
FORT LAUDERDALE  
HOUSTON  
LAS VEGAS  
LONDON<sup>\*</sup>  
LOS ANGELES  
MEXICO CITY<sup>+</sup>  
MIAMI  
MILAN<sup>\*\*</sup>  
NEW JERSEY  
NEW YORK  
NORTHERN VIRGINIA  
ORANGE COUNTY  
ORLANDO  
PHILADELPHIA  
PHOENIX  
ROME<sup>\*\*</sup>  
SACRAMENTO  
SAN FRANCISCO  
SEOUL<sup>-</sup>  
SHANGHAI  
SILICON VALLEY  
TALLAHASSEE  
TAMPA  
TEL AVIV<sup>+</sup>  
TOKYO<sup>+</sup>  
WARSAW<sup>-</sup>  
WASHINGTON, D.C.  
WESTCHESTER COUNTY  
WEST PALM BEACH

<sup>+</sup> OPERATES AS  
GREENBERG TRAURIG GERMANY, LLP  
<sup>\*</sup> OPERATES AS A  
SEPARATE UK REGISTERED LEGAL ENTITY  
<sup>+</sup> OPERATES AS  
GREENBERG TRAURIG, S.C.  
<sup>+</sup> STRATEGIC ALLIANCE  
<sup>-</sup> OPERATES AS  
GREENBERG TRAURIG LLP  
FOREIGN LEGAL CONSULTANT OFFICE  
<sup>+</sup> A BRANCH OF  
GREENBERG TRAURIG, P.A.,  
FLORIDA, USA  
<sup>+</sup> OPERATES AS  
GT TOKYO HORTSU JIMUSHO  
<sup>-</sup> OPERATES AS  
GREENBERG TRAURIG GRZESIAK SP.K.

CAFA NOTICE  
October 29, 2018  
Page 2

acknowledged trace contaminant or background level.” *See* 16 CFR § 260 (2012). To the extent there may be any sulfate in the Subject Products; it was not itself an ingredient, but exists as an impurity in the intended ingredient and, therefore, the representations of SHC comply with the FTC Green Guides.

In May and July 2018, Plaintiffs and SHC participated in two formal mediation sessions with the Honorable John C. Cratsley, retired Massachusetts Superior Court Judge, an experienced and respected mediator. The parties negotiated a Memorandum of Understanding outlining the terms of the settlement, including a total settlement amount of \$2.33 million. The parties subsequently entered into a Settlement Agreement, enclosed with this letter, setting forth the Proposed Settlement. Plaintiffs filed their motion for preliminary approval of the Proposed Settlement on October 19, 2018.

As detailed in the Proposed Settlement, the following individuals are included in the Settlement Class:

All purchasers of any of the Subject Products as defined below during the period between November 19, 2002 through the Effective Date (defined below), excluding any purchases made for purposes of resale. Excluded from the Class are (i) those Class Members who have previously resolved their claims through return of product, settlement, or final judgment, (ii) all persons who are officers or directors of Defendant, and (iii) Judges of the Court.<sup>2</sup>

SHC has agreed to establish a Common Fund of \$2.33 million within 10 days of the Effective Date, against which Settlement Class Members can make claims as described in detail below.

Upon the submission of a valid claim form, Class Members may receive up to \$6 for each purchase of one of the “Subject Products.” Claimants presenting proof of purchase may submit a claim for as many products as they purchased. Claimants without proof of purchase can submit a claim for up to two products purchased. In the event the Claims submitted do not exhaust the common fund, these cash benefits could be increased up to double the original benefit amount.

Although the cash benefits Class Members will receive are substantial given the price Class Members paid for the products, additional features of the Settlement render it even more favorable to Class Members. More than 900,000 Class Members will be able to be identified through a single retailer who has agreed to provide data to the Settlement Administrator to be used to send personal notice to those Class Members. Most of those Class Members will receive email notice or a unique claim code, which will permit the Class Members to click on a link in the email or enter the code that will bring them to an online claim form pre-populated with that class member’s identifying information and purchases as reflected in the retail records. Moreover, upon attestation that none of the claimed products were returned, the retail records will satisfy the proof of purchase requirement of the Settlement, meaning that such customers may obtain the up to \$6 per purchase

---

<sup>2</sup> Also excluded from the Settlement Class are Settlement Class Members who properly exclude themselves in accordance with the terms of the Settlement and the court-approved notices.

CAFA NOTICE  
October 29, 2018  
Page 3

cash settlement benefit for all purchases reflected in the retail records, without the need to submit any additional proof of purchase. The Settlement Administrator is also implementing publication notice through search engines and social media platforms estimated to reach more than 70% of the class members multiple times. The Settlement Administrator will also establish a settlement website that will provide additional information on the Settlement and the Crane Action, including a long-form notice providing additional detail concerning the Settlement, relevant pleadings, and contact information for Class Counsel. In short, SHC has worked with Class Counsel and the Settlement Administrator to design the Settlement to ensure that substantial cash benefits are placed in the hands of Class Members.

Class Counsel has represented that they intend to file a motion with the Court within 75 days of preliminary approval of the Settlement seeking reimbursement of their litigation costs and up to one-third of the Total Settlement Amount for their attorneys' fees. Class Counsel will also seek a Service Award from the Court for the Class Representative in the amount of \$2,000.

In accordance with the CAFA notice provisions, 28 U.S.C. § 1715, SHC has enclosed with this letter a CD containing the following documents:

1. The Complaint and Amended Complaint. *See id.* § 1715(b)(1).
2. Plaintiffs' Motion for Preliminary Approval filed on October 19, 2018. The Court has not yet scheduled a hearing for final approval of the Proposed Settlement. *See id.* § 1715(b)(2).
3. The proposed form of notices to class members about the settlement of the *Crane Action* and their right to request exclusion from the class are attached as exhibits to the accompanying Settlement Agreement and to the Motion for Preliminary Approval. The notices and the notice plan have been submitted to the Court and are subject to Court approval. *See id.* § 1715(b)(3).
4. A copy of the Settlement Agreement which is subject to Court approval. *See id.* § 1715(b)(4).
5. There are no contemporaneous agreements between class counsel and counsel for SHC related to this Settlement. *See id.* § 1715(b)(5).
6. There is no final judgment or notice of dismissal. *See id.* § 1715(b)(6).
7. There are no written judicial opinions relating to the materials described in subparagraphs (3) through (6) of 28 U.S.C. § 1715. *See id.* § 1715(b)(8).

CAFA also requires that a defendant, "if feasible," must provide "the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement," or, if that is not feasible, to provide a "reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement." See 28 U.S.C. § 1715(b)(7)(A)-(B).

CAFA NOTICE  
October 29, 2018  
Page 4

SHC cannot feasibly identify the Settlement Class Members who reside in each state, because SHC does not know the identity of the end users of the Subject Products.<sup>3</sup> During the class period, SHC did not generally sell the Subject Products directly to consumers, or other end users, but rather sold to independent distributors and wholesalers. For this reason, it is also extremely difficult to estimate the total number of potential Settlement Class Members in each state. There are other variables that are not known to the parties, such as how many of the Subject Products may have been purchased by any individual Class Member. However, since the Subject Products were distributed and sold nationwide, it can be assumed that the number of Settlement Class Members in each state may be proportionate to the population of each state, relative to the total population of the United States. Based on this assumption and an estimate of the average number of the Subject products purchased per Class Member, SHC has calculated the potential number of Class Members in each state (including the District of Columbia) during the Class Period. A chart setting forth this information is provided on the enclosed CD.

The foregoing information is provided based on the status of the proceedings at the time of the submission of this notification and on the data currently available to SHC. SHC reserves its right to provide updated information concerning the Proposed Settlement or upon request.

Please feel free to contact me, should you have any questions about the Proposed Settlement.

Sincerely,

/s/ Keith E. Smith  
Keith E. Smith

---

<sup>3</sup> SHC sells more than 70% of the Subject Products through distributors to individual hair salons across the country. Less than 30% is sold through a direct-to-consumer retailer. The retailer has agreed to provide confidential sales information to the Settlement Administrator to facilitate notice and the claims process for its customers.

# **EXHIBIT 2**

**Court-Authorized Notice**

United States District Court for the District of Massachusetts  
*Crane v. Sexy Hair Concepts, LLC, et al.*  
 Case No. 17-cv-10300

**PLEASE READ THIS CLASS CERTIFICATION NOTICE CAREFULLY.  
 IT MAY AFFECT YOUR RIGHTS**

*A court has authorized this notice. This is not a solicitation from a lawyer.*

A \$2.33 million Settlement has been reached in a class action lawsuit claiming that defendant Sexy Hair Concepts, LLC (“SHC” or “Defendant”) manufactured, marketed, and sold certain products that were represented to be free of sulfates and/or salts but that may have contained sulfates and/or salts.

Individuals who purchased any of the SHC products labeled as sulfate-free or salt-free, including the SHC products identified in the list of “Subject Products” affixed to this notice (hereinafter “Subject Products”) between November 19, 2012 through the date of Final Approval may be eligible to receive a cash payment upon the submission of a valid Claim Form, which is enclosed with this notice.

Your legal rights are affected whether you act or do not act. Please read this notice carefully.

Summary of Your Legal Rights and Options in This Settlement	
<b>Submit a Claim</b>	To receive the cash benefit described in this notice, you must submit a Claim Form by mail (using the form enclosed with this notice) or online at <a href="http://www.sulfatesettlement.com">www.sulfatesettlement.com</a> .
<b>Exclude Yourself</b>	Get no benefits from the Settlement. This is the only option that allows you to retain your right to bring your own lawsuit against Defendant about the claims in this case.
<b>Object</b>	Write to the Court and the lawyers for both sides if you do not like the Settlement. The Court will consider your objection in determining whether to approve the Settlement.
<b>Do Nothing</b>	<b>Remain in the Settlement and receive no benefits.</b>

The rest of this notice provides further information about the Action, this Settlement, and your legal rights and options in connection with the Settlement. Capitalized terms in this notice are defined in the Settlement Agreement and Release, which is available on the settlement website.

**Questions? Visit [www.SulfateSettlement.com](http://www.SulfateSettlement.com)**

**BASIC INFORMATION**

**1. Why did I get this notice?**

A Court authorized this notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options before the Court decides whether to give final approval to the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

United States District Court Judge F. Dennis Saylor, of the United States District Court for the District of Massachusetts, is overseeing this case. The case is known as *Crane v. Sexy Hair Concepts, LLC*, Case No. 17-cv-10300 (the “Action”). The person who sued, (the “Plaintiff”), is Molly Crane. The settling Defendant is Sexy Hair Concepts.

## **2. What is the Action about?**

This lawsuit is about the Plaintiff's claim that SHC violated the Massachusetts Consumer Protection Act and was unjustly enriched by manufacturing, marketing, and selling certain shampoos and conditioners that were represented to be free of sulfates and/or salts but that may have contained sulfates and/or salts. Defendant contends that any sulfates or salts in the Subject Products were by-products of another ingredient and were different from the sulfates and salts that SHC intentionally eliminated. Defendant contends that the sodium sulfate and salt that may have been in the Subject Products are not harmful in any way. Defendant denies that it violated the law and/or that anyone incurred damage.

## **3. What is a class action lawsuit and who is involved?**

In a class action lawsuit, one person called the “class representative” (in this case the Plaintiff, Molly Crane) sues on behalf of other people who may have a similar claim. The people together are a “class” or “class members.” In a class action, the claim of the Plaintiff and all Class Members are decided in one action. The Court resolves the claim for everyone in the Class except for those people who choose to exclude themselves from the Class.

## **4. Why is there a Settlement?**

The Court has not decided the Action in favor of either the Plaintiff or Defendant. Instead, both sides have agreed to the Settlement before the Court has decided the Action. By agreeing to the Settlement, the parties avoid the costs and uncertainty of a trial, and Settlement Class Members receive the benefits described in this notice. The proposed Settlement does not mean that any law was broken or that Defendant did anything wrong. Defendant denies all legal claims in this case. Plaintiff and her attorneys think the Settlement is best for everyone who is affected.

### **THE CLAIM IN THE LAWSUIT**

## **5. What does the lawsuit complain about?**

In this lawsuit, the Plaintiff alleges that SHC violated the Massachusetts Consumer Protection Act and was unjustly enriched by manufacturing, marketing, and selling certain shampoos and conditioners that were represented to be free of sulfates and/or salts but that may have contained sulfates and/or salts.

## **6. How does Defendant answer?**

Defendant denies that it violated the law or that anyone incurred damage. Defendant has also asserted affirmative defenses to Plaintiff's and the Class's claims that may defeat or limit recovery of damages.

## **7. Has the Court decided who is right?**

The Court has not decided whether the Plaintiff's claim is correct or whether Defendant did anything wrong. The Court's decision to conditionally certify the Class and authorize the issuance of this notice is not based upon the settlement reached between the parties. It is a decision by the

Court that a contested class would be certified or that the Plaintiff and the Class will win or lose this case. If the parties had not settled the case, the Plaintiff would have had to prove the requirements for class certification and prove her claim at a trial.

**8. What is the Plaintiff asking for?**

By filing the Action, Plaintiff asked the Court to find that Defendant violated the Massachusetts Consumer Protection Act and that Defendant was unjustly enriched. The Plaintiff sought monetary damages from Defendant as well as attorneys' fees, expenses, and the costs of this suit.

**WHO IS IN THE SETTLEMENT**

**9. Am I part of this Settlement?**

You are a member of the Class if, in the United States during the period between November 19, 2012 to the present, you purchased one of the Defendant's shampoo or conditioner products labeled as sulfate-free or salt-free, including the products identified in the list of "Subject Products" enclosed with this notice.

**10. I'm still not sure if I am included.**

If you are still not sure whether you are a member of the certified Class, you can call or write to the lawyers representing the Plaintiff and the certified Class in this case, at the phone numbers or addresses below.

**THE LAWYERS REPRESENTING YOU**

**11. Do I have a lawyer in this case?**

The following lawyers represent the Plaintiff and the certified Class in this case:

Patrick Valley and Edward Haber at Shapiro Haber & Urmy LLP, whose offices are located at 2 Seaport Lane, Boston, MA 02210 (617-439-3939). More information about Shapiro Haber & Urmy LLP is available at [www.shulaw.com](http://www.shulaw.com).

These attorneys are referred to here as "Class Counsel."

**12. Should I get my own lawyer?**

You are not required to hire your own lawyer because Class Counsel is working on your behalf. If you want your own lawyer anyway, you can hire your own lawyer, but you will have to pay that lawyer. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you.

**13. How will the lawyers be paid?**

As part of the Settlement, Class Counsel will seek up to one-third of the Gross Settlement Amount for compensation for their attorneys' fees plus reasonable expenses incurred in pursuing this Action, but the Court must approve any such payment to Class Counsel. Class Counsel will also seek an award from the Court of up to \$2,000 for Plaintiff Molly Crane for her service in representing the Class. Counsel will file their request for an award of attorneys' fees, costs, settlement administration expenses, and service award to the named Plaintiff, no later than February 18, 2019. Once the motion is filed, Class Members may obtain any such submission to the Court from the settlement website or by contacting Class Counsel.



## **THE SETTLEMENT'S BENEFITS**

### **14. What does the Settlement provide?**

In exchange for dismissal of the Action and release of claims against Defendant and any retailer from whom you may have purchased the Subject Products as detailed in the Settlement Agreement, Defendant has agreed to create a fund of \$2.33 million. After deducting costs for notice to Class Members, administration of the Settlement, attorneys' fees and expenses, and an incentive award to the class representative, the funds remaining will be available to be distributed in accordance with the Settlement Agreement to Class Members who submit a timely and valid Claim Form.

### **15. How will Settlement benefits for Class Members be calculated?**

Upon the submission of a valid Claim Form (see question 17 below), Class Members may receive \$6.00 per purchase of Subject Products, including the products on the list of "Subject Products" enclosed with this notice. Class Members who do not have proof of purchase of a Subject Product will be limited to submitting a claim for no more than 2 products purchased. Class Members with proof of purchase may seek a settlement benefit for each Subject Product for which they submit proof of purchase. Proof of purchase includes store receipt, evidence of current possession of a Subject Product, or any comparable evidence from a retailer specifically identifying and showing the purchase of a Subject Product during the Class Period. With respect to Class Members who received a claim code via e-mail or regular mail because they purchased Subject Product(s) from a retailer who is able to provide proof of purchase to the Settlement Administrator, the claim code can be submitted with the Claim Form as proof of purchase for the number of units that the retailer's records reflect that you purchased.

If the total value of valid claims is less than the amount of money available to pay such claims, then the amounts paid for valid claims will be increased *pro rata* up to the amount of money available to pay claims, although the amount paid will not be more than two times the amount set forth in this notice. If the total value of valid claims is more than the amount of money available to pay such claims, then the amounts paid for valid claims will be reduced *pro rata*.

### **16. If I submit a Claim Form, when will I receive the Settlement benefit?**

The parties have proposed to the Court that settlement benefits be mailed to Class Members within thirty (30) days after the Effective Date of the Settlement. The Court has scheduled a hearing to consider whether to grant final approval of the Settlement on April 29, 2019. But, the date on which the Court will grant final approval is not known. And, there may be other reasons that distribution of settlement benefits could be delayed. In order to stay up-to-date on the status of the litigation and when settlement benefits are mailed, check the settlement website ([www.sulfatesettlement.com](http://www.sulfatesettlement.com)) regularly.

## **YOUR RIGHTS AND OPTIONS**

You have to decide whether to (i) stay in the Class and submit a Claim Form; (ii) ask to be excluded; or (iii) file an objection. If you decide to stay in the Class, you must file a Claim Form as set forth in this notice. **If you decide to request to be excluded or wish to object to the Settlement, you must do so by March 20, 2019.**

**17. What do I need to do to receive the cash benefit provided for by this Settlement?**

If you are a Class Member (see question 9 above) and want to receive the cash benefit described in this settlement, you **MUST** submit a Claim Form, either by mailing a completed, signed Claim Form enclosed with this notice, or by submitting a Claim Form online at [www.sulfatesettlement.com](http://www.sulfatesettlement.com). In exchange for those benefits, you will have released and waived your right to sue Defendant or any retailer from whom you may have purchased your Subject Products over the issues involved in the Action.

**18. What happens if I ask to be excluded?**

If you exclude yourself from the Class—which is sometimes called “opting out” of the Class - you will not get any money or benefits from the settlement of the Action. If you exclude yourself, you will not be legally bound by the Court’s judgments in the Action. If you start your own lawsuit against Defendant after you exclude yourself, you’ll have to hire and pay your own lawyer for that lawsuit, and you’ll have to prove your claims. To ask to be excluded from the certified Class, you must send an “Exclusion Request” in the form of a letter sent by US mail, stating that you want to be excluded from *Crane v. Sexy Hair Concepts, LLC*. Be sure to include your full name and current address, state specifically in your letter that you wish to be excluded from the class, and personally sign the letter. You must mail your exclusion request postmarked by March 20, 2019, to: *Crane v. Sexy Hair Concepts, LLC*, Exclusions, c/o Patrick J. Valley, Esq., Shapiro Haber & Urmy LLP, 2 Seaport Lane, Boston, MA 02210.

**19. How do I object, if I want to?**

If you wish to object to the Settlement, you must file documents explaining the basis of your objection by March 20, 2019. Your objection must be filed with the Court, with copies sent to Class Counsel. The Court’s address is United States District Court, 1 Courthouse Way, Suite 2300, Boston, MA 02210. Class Counsel’s address for objections is: *Crane v. Sexy Hair Concepts, LLC*, Objections, c/o Patrick J. Valley, Esq., Shapiro Haber & Urmy LLP, 2 Seaport Lane, Boston, MA 02210. If you object, you should reference the case name and number, found at the top of this notice, in your filing.

To state a valid objection, a Class Member must include the following information in the objection: (1) full name, current address, and current telephone number; (2) documentation to establish membership in the Class, such as receipts or other documents relating to your purchase or a simple statement in your objection that you purchased one or more of the subject products; (3) a statement as to whether the objection applies only to the objector, to a specific subset of the class, or to the entire class; (4) a statement of the basis for the objection, including the factual and legal grounds for the position; (5) copies of any documents supporting the objection if you have any; (6) the identity of all counsel, if any, who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement or fee application; (7) any and all agreements that relate to the objection or the process of objecting—whether written or oral—between objector or objector’s counsel and any other person or entity; and (8) the number of times in which the objector, the objector’s counsel and/or counsel’s law firm have objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which such prior objections have

been made, and a copy of any orders related to or bearing upon such prior objections that were issued by the trial and/or appellate courts in each listed case. In order for an objection to be valid, you must personally sign the objection (an attorney's signature is not sufficient).

**20. What happens if I do nothing?**

If you do nothing, you will not receive any benefits from this Settlement but you will be bound by its terms and you will give up your right to start a lawsuit about the legal issues resolved by the Settlement against the Defendants and anyone else from whom you may have purchased one of the Subject Products.

**21. When will the Court decide whether to approve the Settlement?**

The Court has set a hearing at 2:00 p.m. on April 29, 2019, at the United States District Court, 1 Courthouse Way, Suite 2300, Boston, MA 02210. The hearing may be moved to a different date or time without further notice, although the settlement website will be updated with any change in date or time. Please check the settlement website regularly if you plan on attending to ensure you show up on the right date and time. At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will also consider Class Counsel's application for attorneys' fees and expenses and for an incentive award to the class representative. After the hearing, the Court will decide whether to grant final approval of the Settlement.

**GETTING MORE INFORMATION**

**22. Is more detail available?**

If you have any questions about this class action notice or this case, you should contact one of the Class Counsel identified above, who will be pleased to answer your questions. There would be no cost or obligation to you. You may also visit a website created specifically for this Settlement, [www.sulfatesettlement.com](http://www.sulfatesettlement.com), from which you can access additional information about the case, including this notice, contact information for Class Counsel, and court filings.

**PLEASE DO NOT ADDRESS QUESTIONS ABOUT THE SETTLEMENT OF THE LITIGATION TO THE COURT, TO THE JUDGE, TO DEFENDANT SEXY HAIR CONCEPTS OR TO ANY RETAILER FROM WHOM YOU PURCHASED ANY SUBJECT PRODUCTS.**

DATED: January 21, 2019.

# **EXHIBIT 3**

**Court-Authorized Notice**

United States District Court for the District of Massachusetts  
*Crane v. Sexy Hair Concepts, LLC, et al.*  
Case No. 17-cv-10300

**A court has authorized this notice. This is not a solicitation from a lawyer.**

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS TO PARTICIPATE IN OR OBJECT TO A PROPOSED SETTLEMENT OF THE LITIGATION LISTED ABOVE MAY BE AFFECTED.**

A \$2.33 million Settlement has been reached in a class action lawsuit claiming that Sexy Hair Concepts, LLC (“SHC”) marketed and sold certain products that were represented to be free of sulfates and/or salts but that may have contained sulfates and/or salts (“Subject Products”). SHC contends that any sulfates or salts in these Subject Products were by-products of another ingredient and were different from the sulfates and salts that SHC intentionally eliminated from the products. SHC contends that the sodium sulfate and salt that may have been in the product are not harmful in any way.

**Why am I receiving this notice?** You are receiving this notice because a retailer’s records indicate that you may have purchased certain SHC products between November 19, 2012 and the present, and your purchase makes you a Class Member eligible to receive a cash payment upon the submission of a valid Claim Form.

**What does the Settlement provide?** The Settlement creates a fund of \$2.33 million. Each Class Member who files a valid and timely claim form will be eligible to receive a cash payment. Class Members who submit a valid claim form may receive \$6.00 per purchase of Subject Products. A claim form is available at [www.sulfatesettlement.com](http://www.sulfatesettlement.com). To receive the maximum settlement cash benefit, use the claim code or link provided below when you submit a claim form either online or by mail.

**Claim ID:** <<Claim8>>

**PIN:** <<PIN>>

**You may also file a claim by clicking on the link below:**

**FILE A CLAIM**

**What are my options?** To receive a cash payment, **you must mail or submit online a completed claim form by March 20, 2019.** If you do not wish to participate in the Settlement, you may exclude yourself by March 20, 2019, or you may object to the Settlement by March 20, 2019. The specific details for filing an exclusion or objection are in the detailed notice available at [www.sulfatesettlement.com](http://www.sulfatesettlement.com). The Court will hold a hearing on April 29, 2019 to consider the Settlement and Class Counsel’s request for an award of attorneys’ fees of up to one-third of the settlement amount, plus expenses, as well as an incentive award for the Plaintiff of up to \$2,000. You do not have to attend this hearing. If you want your own lawyer you may hire a lawyer to speak for you at the hearing.

**Your legal rights are affected whether you act or do not act.** You may be giving up your right to start a lawsuit about the legal issues resolved by the Settlement against the Defendants and anyone else from whom you may have purchased one of the Subject Products. Please visit [www.sulfatesettlement.com](http://www.sulfatesettlement.com) for further details on how to file a claim, exclude yourself, or object.

DATED: January 18, 2019.

# **EXHIBIT 4**

Chloride Sulfate-Free Liquid Action  
Settlement Administrator  
P.O. Box 404000  
Louisville, KY 40233-4000

2D

## LEGAL NOTICE

See other side for details



Postal Service: Please Do Not Mark Barcode

S3M-<<Claim8>>-<<CkDig>>

Claim ID: <<Claim8>>

Access Code: <<PinCode>>

«FirstNAME» «LastNAME»

«ADDR1» «ADDR2»

«CITY», «STATE» «ZIP»

«FCOUNTRY»

# S3M

United States District Court for the District of Massachusetts  
*Crane v. Sexy Hair Concepts, LLC, et al.*  
Case No. 17-cv-10300

**A court has authorized this notice. This is not a solicitation from a lawyer.**

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHT TO PARTICIPATE IN OR OBJECT TO A PROPOSED SETTLEMENT OF THE LITIGATION LISTED ABOVE MAY BE AFFECTED.**

A \$2.33 million Settlement has been reached in a class action lawsuit claiming that Sexy Hair Concepts, LLC (“SHC”) marketed and sold certain products that were represented to be free of sulfates and/or salts but that may have contained sulfates and/or salts (“Subject Products”). SHC contends that any sulfates or salts in these Subject Products were by-products of another ingredient and were different from the sulfates and salts that SHC intentionally eliminated from the products. SHC contends that the sodium sulfate and salt that may have been in the product are not harmful in any way.

**Why am I receiving this notice?** You are receiving this notice because a retailer’s records indicate that you may have purchased certain SHC products between November 19, 2012 and the present, and your purchase makes you a Class Member eligible to receive a cash payment upon the submission of a valid Claim Form.

**What does the Settlement provide?** The Settlement creates a fund of \$2.33 million. Each Class Member who files a valid and timely claim form will be eligible to receive a cash payment. Class Members who submit a valid claim form may receive \$6.00 per purchase of Subject Products. A claim form is available at [www.sulfatesettlement.com](http://www.sulfatesettlement.com). To receive the maximum settlement cash benefit, use the claim code provided on the other side when you submit a claim form either online or by mail.

**What are my options?** To receive a cash payment, you must mail or submit online a completed claim form by March 20, 2019. If you do not wish to participate in the Settlement, you may exclude yourself by March 20, 2019, or you may object to the Settlement by March 20, 2019. The specific details for filing an exclusion or objection are in the detailed notice available at [www.sulfatesettlement.com](http://www.sulfatesettlement.com). The Court will hold a hearing on April 29, 2019 to consider the Settlement and Class Counsel’s request for an award of attorneys’ fees of up to one-third of the settlement amount, plus expenses, as well as an incentive award for the Plaintiff of up to \$2,000. You do not have to attend this hearing. If you want your own lawyer, you may hire a lawyer to speak for you at the hearing.

**Your legal rights are affected whether you act or do not act.** You may be giving up your right to start a lawsuit about the legal issues resolved by the Settlement against the Defendants and anyone else from whom you may have purchased one of the Subject Products. Please visit [www.sulfatesettlement.com](http://www.sulfatesettlement.com) for further details on how to file a claim, exclude yourself, or object.

DATED: January 21, 2019.



# **EXHIBIT 5**

## A group of people are protesting against a government shutdown. In the foreground, a person on the left wears a black beanie with a 'UNION' logo and a purple jacket with 'ATC' on it. Next to them, a person wears a green and white striped beanie and sunglasses. To the right, a person wears a blue and white striped beanie and sunglasses. They are holding up white signs that say 'SHUTDOWN' with a large red prohibition symbol (a circle with a diagonal line) over the text. Another sign on the right says 'STOP THE SHUTDOWN' in white text on a red background. In the background, the U.S. Capitol dome is visible under a clear blue sky, with bare trees in the foreground.

## WHAT'S HAPPENING



[www.sulfatesettlement.com](http://www.sulfatesettlement.com)

by Taboola



**The founder of the World Economic Forum shares what he sees as the biggest threat ...**




**How this 7-year-old boy is changing the modeling industry with his beautiful long**

**If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.**

**File a Claim**

[www.sulfatesettlement.com](http://www.sulfatesettlement.com)




U.S. World Opinion Politics Entertainment Business Lifestyle TV Fox Nation Radio More


Hot Topics Trump vs. Schultz

Markets S&P 500 -0.78% Sponsored by Ameritrade

If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement. [File a Claim](#)  
www.sulfatesettlement.com



ON NOW  
Your World With Neil Cavuto




### PUNISHING VENEZUELA


#### WH announces sweeping sanctions against Maduro, oil monopoly as Bolton warns 'all options' on table

MARK PENN: Could the US end up like Venezuela?


Trump administration unveils sanctions against Venezuela's state-owned oil company




AMERICA'S NEWSROOM  
WH: Trump has perfectly set table for border security negotiations




THE DAILY BRIEFING  
Rep. Crenshaw on public opposition to a border wall



Trump enters next phase of border negotiations with low expectations




FOX & FRIENDS FIRST  
Could ex-Starbucks CEO Howard Schultz be trouble for Dems in 2020?



#### WHINING AND LOSING

##### NEWT GINGRICH: Dems and Never Trumpers will ensure this in 2020


Bloomberg swipes at Schultz over possible 2020 bid: 'No way an independent can win'




#### TRAGIC CRIME

##### Woman found frozen under vehicle in parking garage dies, suspect arrested

Louisiana suspect in killing of 5 captured in Virginia after manhunt, police say




ROGER STONE  
TONIGHT 9PM ET



Watch Exclusive Content  
Live or On-Demand

Start Your Free Trial



KCC





U.S. World Opinion Politics Entertainment Business Lifestyle TV Fox Nation Radio More

Hot Topics Trump vs. Schultz | Brokaw comments slammed | Terror on turnpike



Watch Exclusive Content  
Live or On-Demand  
Start Your Free Trial  
**FOX**  
NATION

ADVERTISEMENT

VIRAL · Published 1 hour ago

# Kate Hudson clarifies saying she's raising her daughter with a 'genderless' approach

 By Sasha Savitsky | Fox News



Ad Choices

Ad Full



00:27

If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.

File a Claim

www.sulfatesettlement.com

TOP STORIES

People Want Democrats To Get Trump's Tax Returns, Please

William Barr Indicates Concerns Over Trump's Privacy Could Shield Mueller Report

Eric Trump Miffed Media Reported About Undocumented Workers At Trump Clubs

Joshua Tree May Feel The Effects Of Government Shutdown For Hundreds Of Years

GOP Tax Cut Had No Major Impact On Business Investment Or Hiring: Survey

Roger Stone Says FBI Treated Him Worse Than Bin Laden: 'It's Unconscionable'

**Wind Chill Forecast**  
Through 7 PM EST, Thursday, Jan 31

**DEEP FREEZE: 'DEADLY' COLD DESCENDS**  
Parts Of Country Brace For Sub-Zero Arctic Temperatures

**'BLACK PANTHER' WINS TOP PRIZE**

If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.

**File a Claim**

www.sulfatesettlement.com

LATEST NEWS

Nancy Pelosi Invites President Trump To Give State Of The Union Address On Feb. 5  
6 minutes ago


10-Year-Old Catches Newborn Baby Sister In Viral Birth Photos  
27 minutes ago

15 Salads Even A 'Manly' Man Could Eat  
40 minutes ago

Here Are The Movies Coming To Netflix This Week  
3 hours ago


MMA Match Becomes Slippery Bloodbath, And You Might Want To Look Away  
4 hours ago

Tarana Burke Talks Me Too's New PSA Campaign




Stock up on favorites for the big game!

Shop Now



EXPLORE







Q


Your Profile

SUBSCRIBE

HOME • TV

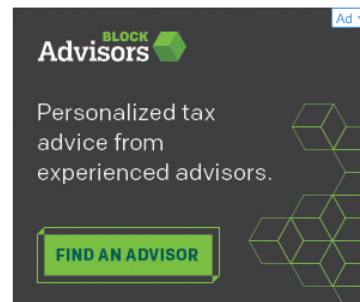
# *The Real Housewives of New York City* Returns with Explosive Season 11 Trailer



DAVE QUINN

January 28, 2019 11:01 AM




**BLOCK Advisors**

Personalized tax advice from experienced advisors.

FIND AN ADVISOR

You May Like by Outbrain

30 Awful 80s Shows We Wish We Could Forget



If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.

File a Claim

www.sulfatesettlement.com

EXPLORE
People

Q
Your Profile
SUBSCRIBE

Christian and so is she, and there's definitely some chemistry there."

"They could turn into something in the future, but it hasn't happened yet," the source says. "They're just talking and spending a little bit of time together. This isn't a big romance, but I'd say there's some mutual interest there. There's potential. So who knows?"

**RELATED VIDEO: Kourtney Kardashian Reveals How She'd React If Scott Disick and Sofia Richie Got Engaged**

And it's not like she hasn't dated younger men before. Kardashian was most ly linked to *Grown-ish* actor and model Luka Sabbat, 21, and brief romance came after her split from Younes Bendjima, 25.

**GET 4 FREE ISSUES**  
of PEOPLE Magazine  
when you subscribe today

REDEEM OFFER

**If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.**

**File a Claim**

www.sulfatesettlement.com

Ad : (0:02)

**Spectrum**

TV + INTERNET

**\$89.98** /MO

NO CONTRACTS

Spectrum.com

CLICK TO LEARN MORE

Thinking He Received...

BY CLEVERST I SPONSORED



**RADIO.COM**

[LISTEN](#)[MUSIC](#)[NEWS](#)[SPORTS](#)[PODCASTS](#)[MORE](#)

**If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.**



**File a Claim**  
[www.sulfatesettlement.com](http://www.sulfatesettlement.com)

Ad


[R](#) / [MUSIC](#) / [HIP HOP R&B](#)

# Kehlani Has Adorable Baby Shower, SZA Gifts Her a Year's Worth of Diapers


See the stunning photos from her celebration




**LATEST in MUSIC**



**SCREENSHOTS:** James Hetfield Stars As Police Officer In Ted Bundy Film Trailer



Future Has His Sixth Number 1 Album, And Ties Elton John For An Amazing Record With 'The WIZRD'




Miley Cyrus & Mark Ronson

**RADIO.COM**  
LISTEN MUSIC NEWS SPORTS PODCASTS MORE





R / NEWS / NATIONAL NEWS

## Exclusive: Ann Coulter Lashes Out Against Trump



Radio.com

January 25, 2019  
3:10 pm

**(KNX 1070/AP)** -- As the holidays drew near toward the end of December, both Republicans and Democrats in Congress thought they had a deal with President Trump to fund the federal government, at least for several weeks into the new year.






But then the President heard it from his conservative base and from one person in particular: if you don't use government funding as leverage to get your promised border wall, you'll be considered a loser. That one person, who has been credited


If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.


**File a Claim**

[www.sulfatesettlement.com](http://www.sulfatesettlement.com)

**LATEST in NEWS**

-  Bridal Party Strikes Power Pose With Hands In Gowns' Pockets
-  Toddler Rescued By Police After Getting Stuck In Activity Cube Toy
-  100 Bitcoin ATMs Are 'Hidden In Plain Sight' Around Philadelphia
-  Police Find Stolen Dog, Scooby, During Burglary Investigation
-  Hasbro Trademarks The Distinct 'Sweet' Smell Of Play-Doh


 reddit

 r/fashion

Search r/fashion

LOG IN

SIGN UP

 Join the 198k people in the r/fashion community


GET STARTED

↑  
169  
↓

Posted by u/KSSLR 3 months ago

**Rick Owens sets runway on fire at Paris Fashion Week show**

[dezeen.com/2018/1...](https://dezeen.com/2018/1...)




47 Comments Share Save ...

↑  
151  
↓

Posted by u/KSSLR 5 months ago

**Fashion History - Edwardian Style of Late 1890s - 1914**

[bellatory.com/fashio...](https://bellatory.com/fashio...)




23 Comments Share Save ...

↑  
359  
↓

Posted by u/BlueCoatWife 7 months ago

**Kate Spade found dead in New York apartment**

[cnn.com/us/liv...](https://cnn.com/us/liv...)



69 Comments Share Save ...

↑  
105  
↓

Posted by u/KSSLR 9 months ago

**How has the fashion industry benefited society on a regional or universal level?**

I thought this could be a conversation that could get us to think more deeply and express ourselves about something we're all passionate about.


66 Comments Share Save ...


↑  
1  
↓

Posted by u/jeffreysan1996 9 months ago

**This Italian Brand Has A Colonialism Line, Racist Or...**

[thenewgentleman.co.uk/2018/0...](https://thenewgentleman.co.uk/2018/0...)



 r/fashion

198k  
Subscribers

18  
Online

Fashion, fashion industry, fashion news, clothing, fashion design

SUBSCRIBE

CREATE POST

ADVERTISEMENT

**If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.**

**File a Claim**


[www.sulfatesettlement.com](https://www.sulfatesettlement.com)

reddit Popular Search Reddit LOG IN SIGN UP

8.0k Comments Share Save

40.3k r/politics · Posted by u/AFWxGuy 6 hours ago  
Ocasio-Cortez: If Trump was gone tomorrow, it wouldn't change 'systemic injustices'  
thehill.com/homene...  
3.2k Comments Share Save

19.6k r/pics · Posted by u/KyleFromKik 4 hours ago  
Group picture of those who died in the Challenger Disaster 33 years ago today



619 Comments Share Save

r/interestingasfuck · Posted by u/Navxin 4 hours ago

TRENDING COMMUNITIES

- r/precognition 7,374 subscribers SUBSCRIBE
- r/PiratePets 7,784 subscribers SUBSCRIBE
- r/residentevil 57,853 subscribers SUBSCRIBE
- r/BossFights 22,856 subscribers SUBSCRIBE
- r/badmathematics 23,000 subscribers SUBSCRIBE

ADVERTISEMENT

**If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.**

**File a Claim**

www.sulfatesettlement.com


About Careers Press Advertise Blog Help The Reddit App Reddit Coins Reddit Premium Reddit Gifts

Content Policy | Privacy Policy  
User Agreement | Mod Policy  
© 2019 Reddit, Inc. All rights reserved




**TMZ** NEWS SPORTS VIDEOS PHOTOS CELEBS TOURS WATCH TMZ

**HOT VIDEO**



**SIGNS OF CANCER**

Powered by  WIBBITZ

ADVERTISEMENT


If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.

**File a Claim**


[www.sulfatesettlement.com](http://www.sulfatesettlement.com)

**MORE FROM TMZ**


**BREAKING NEWS**



**TOM BRADY  
FLYING ENTIRE FAM  
TO SUPER BOWL**




Tom Brady  
Flying Entire Fam To Super Bowl




R. Kelly  
Allegedly Threw Ex-GF Into A Wall  
In Jealous Backstage Rage


**AROUND THE WEB**



Kim, Kylie, Kourtney  
and Kendall Flip Out  
After Cheating Scandal



Penny Marshall Death  
Certificate Reveals Her  
True Cause of Death



Katy Perry's  
Bootylicious Bikini  
Vacation



The image is a screenshot of a TMZ website article. The main visual is a photograph of actors Chadwick Boseman and Michael B. Jordan standing together on a red carpet. Boseman is on the left, wearing a brown patterned jacket over a black turtleneck. Jordan is on the right, wearing a dark blue suit with a colorful floral patterned vest. They are both smiling and looking towards the camera. The background is dark with some lights visible.

At the top of the page, there is a navigation bar with links: NEWS, SPORTS, VIDEOS, PHOTOS, CELEBS, TOURS, and WATCH TMZ. A search icon and a close icon are also present. The page number "1 / 35" is displayed in the top right corner.

The article title is "2019 SAG AWARDS -- BEHIND THE SCENES". Below the title are social media sharing icons for Facebook, Twitter, and Email. The text "Photo: Getty" is visible. The main headline reads "Chadwick Boseman and Michael B. Jordan".

Below the main headline, there are several smaller article teasers with accompanying photos:

- "Bath Stern Sets the..."
- "Jaden Smith Says 'It's True' That Tyler The Creator Is His Beau"
- "Katy Perry's Bootylicious Bikini Vacation"
- "Salma Hayek's Beach..."

At the bottom of the page, there is a large advertisement for "sexyhair® shampoo or conditioner products". The ad text reads: "If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement." Below this text is a button that says "File a Claim" and the website "www.sulfatesettlement.com".

Stay Connected For As Low As \$9.99/Month

Subscribe Now

SUBSCRIBE NOW  
AS LOW AS  
\$9.99 PER MONTH

NEWSSPORTSLIFEMONEYTECHTRAVELOPINION38°CROSSWORDSSUPER BOWL 53INVESTIGATIONSMORE

SubscribeSign In

If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.  
File a Claim  
www.sulfatesettlement.com

f

t

in

YOUR EMAIL IS YOUR PASSPORT

Unlock exclusive access and special offers

CREATE FREE ACCOUNT

'Minimize talking' outside: Polar vortex bears down on North as Deep South braces for snow

John Bacon and Doyle Rice, USA TODAYPublished 8:02 a.m. ET Jan. 28, 2019 | Updated 4:26 p.m. ET Jan. 28, 2019

USA TODAY

THE NEW Johnson's  
Now with 50% fewer ingredients.  
SEE WHAT'S NEW >

KCC



The Weather Channel

Show me the weather in... city, zip, or place

FIND ME

US | °F

⚙️

MENU

72° Walnut Park, CA

TodayHourly5 Day10 DayWeekendMonthlyMapsMore Forecasts

Ad

If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.

File a Claim

www.sulfatesettlement.com

# WIDESPREAD SUBZERO COLD AHEAD

THE LATEST FORECAST



## Polar Vortex Triggers Coldest Arctic Outbreak in 2 Decades

Wind chills in the -30s, -40s, -50s, even -60s are possible

Midwest Cities Will be Colder Than Antarctica



Winter Storm Jayden: Where to Expect the Worst



Jayden: Hundreds of Flights Canceled, Schools Closed



Winter Storm to Bring Snow and



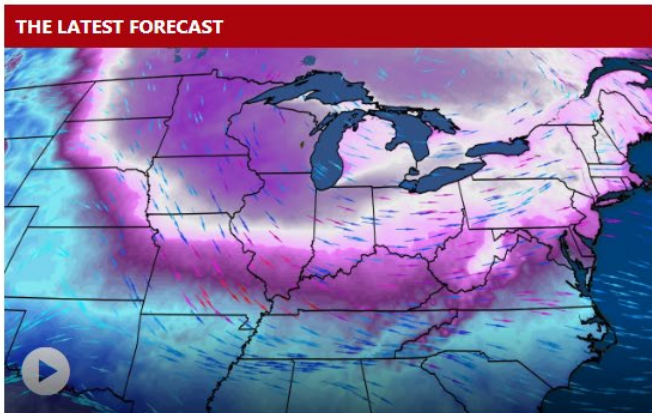
HOME CHEF

MEALS EVERYONE CAN COOK

Advertisement



## WIDESPREAD SUBZERO COLD AHEAD



### Coldest Arctic Outbreak in 2 Decades is Coming

Wind chills in the -30s, -40s, -50s, even -60s are possible

Midwest Cities Will be Colder Than Antarctica ▶

It's Not Just Cold Temps You Have to Worry About ▶

Car Spinning on Icy Road Clips Deputy's Vehicle ▶

Super Bowl Week in Atlanta: Here's Our Forecast ▶

Five Years Ago Atlanta Came to a Standstill ▶



Winter Storm Jayden: Where to Expect the Worst



Jayden: Hundreds of Flights Canceled, Schools Closed



Winter Storm to Bring Snow and Ice to the South





Teen Found Dead After Disappearing in Winter Storm

Ad


**If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.**

**File a Claim**

[www.sulfatesettlement.com](http://www.sulfatesettlement.com)


**Crane v. Sexy Hair Concepts, LLC**  
Sponsored (demo) · 





If you bought certain sexyhair® shampoo or conditioner products that were labeled sulfate free or salt free, you could get \$6 or more from a class action settlement.




[SULFATESETTLEMENT.COM](http://SULFATESETTLEMENT.COM)


**Crane v. Sexy Hair Concepts, LLC** [Learn More](#)

 Chandra Mcfaddn


 Like  Comment  Share 

**Your Pages (10)** ▾ 

**Sponsored** [Create Ad](#)





**Digital Fundamentals**  
[portal.iab.com](http://portal.iab.com)  
Learn to navigate the digital ecosystem from the experts at IAB.




*Lemonade*  
**Protect your stuff starting at \$5/mo**

**Get renters insurance in 90 seconds**  
[lemonade.com](http://lemonade.com)  
Every 90 seconds, someone gets a Lemonade policy. Find out why.

English (US) · Français (France) ·  
Español · Português (Brasil) · Deutsch 

[Privacy](#) · [Terms](#) · [Advertising](#) · [Ad Choices](#)  ·  
[Cookies](#) · [More](#) ▾  
Facebook © 2019

**Sponsored**[Create Ad](#)



**Crane v. Sexy Hair Concepts, LLC**  
sulfatesettlement.com  
If you bought certain sexyhair® shampoo or  
conditioner products that were labeled sulfate...

English (US) · Français (France) ·  
Español · Português (Brasil) · Deutsch [+](#)

[Privacy](#) · [Terms](#) · [Advertising](#) · [Ad Choices](#) [▶](#)  
[Cookies](#) · [More](#) [▼](#)  
Facebook © 2019

